

Remarks

Claims 1-14 are withdrawn. Claims 15, 18, 24 and 25 are amended. After the amendment(s) claims 1-25 are pending (with claims 1-14 withdrawn from consideration) in the application. Please reconsider the rejections in light of the changes to the application and the following remarks.

Applicant affirms the election of Group II, claims 15-25 as mentioned in the Official Action, page 2, the last paragraph.

The drawings were considered unacceptable due to the nature of various letters, numbers and lines. Replacement Sheets for the drawings are enclosed as per 37 CFR 1.121(d) wherein the letters, numbers and lines have been formalized; Figure no. 1A has been relabeled as Figure 12 (as before appearing on sheet 8 of 8); and in Fig. 11 "77c" is changed to - 77e - (so as not to conflict with "77c" in Fig. 9). Please reconsider the replacement drawings.

Paragraph 0009 of the specification has been changed in accordance with the relabeling of Figure 1A as Figure 12. Paragraph 0020 of the specification has been changed so that the reference number for "auger device 77c" (Fig. 9) does not conflict with "sprayer nozzle 77e" (Replacement Fig. 11).

Claim 17 was rejected under section 112 for being indefinite. Claim 17 is dependent upon claim 16 which is dependent upon claim 15. Claim 15 is amended to include the "reactor vessel" as a positive element, so structural antecedent basis

is now provided for the “reactor vessel” of claim 17. Therefore, it is believed the section 112 rejection is no longer applicable.

The basis for the changes to claims 15 and 24 appear in Fig. 1; original claims 1 & 14; and paragraphs 0012 (the last sentence), 0021, and 0023. The basis for the changes to claim 18 appear in paragraph 0021. The basis for the changes to claim 25 appear in Fig. 1; original claims 1 & 14; and paragraphs 0012 (the last sentence), 0015, 0021, 0023 and 0025.

Claims 15-25 were rejected under Section 102(b) as being anticipated by Wightman et al. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. MPEP 2131. With respect to claims 15-24, Wightman et al. do not disclose a reactor vessel; wherein the robotic device is within the reactor vessel; and the reactor vessel being free from having a human operator within the reactor vessel. With respect to claim 25 Wightman et al. do not disclose a vessel wherein the robotic device is within the vessel; a means for wedging the robotic device against an interior vessel wall; and the vessel being free from having a human operator within the vessel.

Claims 15, 16, 18, 23 and 25 were rejected under Section 102(b) as being anticipated by Johnson. With respect to claims 15, 16, 18, and 23 Johnson does not disclose a robotic device within a reactor vessel; and the reactor vessel being free from having a human operator within the reactor vessel. With respect to claim 25 Johnson does not disclose a robotic device within a vessel; a means for

wedging the robotic device against an interior vessel wall; and the vessel being free from having a human operator within the vessel.

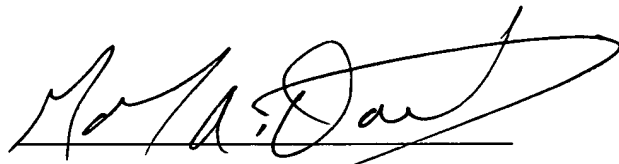
Claim 24 was rejected under Section 102(b) as being anticipated by Cates et al. With respect to claim 24 Cates et al. do not disclose a reactor vessel; wherein the robotic device is within the reactor vessel; and the reactor vessel being free from having a human operator within the reactor vessel.

In light of the Supplemental Information Disclosure Statement filed December 11, 2006 and the other art of record with respect to claims 15-24, it is believed that the claimed reactor vessel being free from having a human operator within the reactor vessel constitutes a point of novelty as per rule 37 CFR 1.111(c). The prior art also does not teach or provide the suggestion/motivation for placing a robotic device within the reactor vessel whilst such reactor vessel is free from having a human operator within the vessel (the prior art in fact teaches away in teaching/suggesting that a human operator should be within the reactor vessel). Applicant's comments with respect to claim 25 are the same albeit further including the distinction from the prior art that the robotic device has a wedging means for wedging the robotic device against the interior wall of the vessel.

It is also believed that the claim language "reactor vessel being free from having a human operator" is not vague or indefinite as supported at MPEP 2173.05(i). In this application such claim language is needed for purposes of demarcation of the meaning of robot in that the claimed "robotic device" is not *merely* some automated machine having a human operator within the vessel.

The undersigned attorney thanks the examining attorney for the thorough Office Action. Please reconsider and reexamine the application, and telephone the undersigned attorney if it could help to expedite the resolution of this application.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Mark A. Oathout', written over a horizontal line.

Mark A. Oathout, Attorney for Applicant
Registration No. 33,747
3701 Kirby Drive,
Suite No. 960
Houston, Texas 77098
Telephone (713) 522-6565
Facsimile (713) 522-8889
mark@oathoutlaw.com